

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Pro-Life Action Ministries,
Lucy Maloney, Thomas Wilkin,
and Debra Braun,

Court File No. 23-CV-853 (ECT/DJF)

Plaintiffs,

v.

**RULE 68 OFFER OF JUDGMENT TO
PLAINTIFF PRO-LIFE ACTION
MINISTRIES**

City of Minneapolis,
A Minnesota municipality,

Defendant.

TO: Plaintiff Pro-Life Action Ministries and its attorneys of record:

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant City of Minneapolis hereby offers to allow Plaintiff Pro-Life Action Ministries to take judgment against Defendant on all claims made or which could have been made in Plaintiff's Amended Complaint in the amount of \$10.00 (ten dollars), plus reasonable attorneys' fees and costs incurred by Plaintiff prior to the date of this offer; that is, with the costs then accrued. The attorneys' fees and costs will be in an amount to be set by the Court. This amount is intended to cover and exceed all damages sought in the Amended Complaint, including "nominal" damages.

Said relief is inclusive of all of Plaintiff's claims and relief sought against Defendant as set forth in Plaintiff's Amended Complaint. Acceptance of the Rule

68 Offer will terminate all proceedings before the Court and allow Plaintiff's counsel to petition the Court for reasonable costs and attorney's fees incurred to date. If Plaintiff accepts this offer, Plaintiff shall have the right to petition the Court for Plaintiff's claimed reasonable attorneys' fees and costs as a prevailing party in this action pursuant to 42 U.S.C. § 1988(b) and any other legally applicable authority. Defendant reserves the right to challenge Plaintiff's petition for attorneys' fees and costs pursuant to Federal Rule of Civil Procedure 54(d)(2)(C) and any other legally applicable authority.

Acceptance of this offer of judgment will act to release and discharge Defendant, its successors or assigns; and all past and present officials, employees, representatives and agents of the City of Minneapolis, or any agency therefrom, from any and all claims that were or could have been alleged by Plaintiff in the above-captioned action.

Pursuant to the terms of Rule 68, this offer will remain open and irrevocable for 14 calendar days after service by U.S. Mail and email. If Plaintiff does not accept this offer in writing within 14 days after service, then this offer shall be deemed withdrawn in accordance with Fed. R. Civ. P. 68(b).

Date: December 6, 2024

KRISTYN ANDERSON

City Attorney

By s/ Sara J. Lathrop

SARA J. LATHROP (# 0310232)

TRACEY N. FUSSY (# 0311807)

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Attorneys for Defendant

City of Minneapolis

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Pro-Life Action Ministries,
Lucy Maloney, Thomas Wilkin,
and Debra Braun,

Court File No. 23-CV-853 (ECT/DJF)

Plaintiffs,

v.

**RULE 68 OFFER OF JUDGMENT TO
PLAINTIFF LUCY MALONEY**

City of Minneapolis,
A Minnesota municipality,

Defendant.

TO: Plaintiff Lucy Maloney and her attorneys of record:

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant City of Minneapolis hereby offers to allow Plaintiff Lucy Maloney to take judgment against Defendant on all claims made or which could have been made in Plaintiff's Amended Complaint in the amount of \$10.00 (ten dollars), plus reasonable attorneys' fees and costs incurred by Plaintiff prior to the date of this offer; that is, with the costs then accrued. The attorneys' fees and costs will be in an amount to be set by the Court. This amount is intended to cover and exceed all damages sought in the Amended Complaint, including "nominal" damages.

Said relief is inclusive of all of Plaintiff's claims and relief sought against Defendant as set forth in Plaintiff's Amended Complaint. Acceptance of the Rule

68 Offer will terminate all proceedings before the Court and allow Plaintiff's counsel to petition the Court for reasonable costs and attorney's fees incurred to date. If Plaintiff accepts this offer, Plaintiff shall have the right to petition the Court for Plaintiff's claimed reasonable attorneys' fees and costs as a prevailing party in this action pursuant to 42 U.S.C. § 1988(b) and any other legally applicable authority. Defendant reserves the right to challenge Plaintiff's petition for attorneys' fees and costs pursuant to Federal Rule of Civil Procedure 54(d)(2)(C) and any other legally applicable authority.

Acceptance of this offer of judgment will act to release and discharge Defendant, its successors or assigns; and all past and present officials, employees, representatives and agents of the City of Minneapolis, or any agency therefrom, from any and all claims that were or could have been alleged by Plaintiff in the above-captioned action.

Pursuant to the terms of Rule 68, this offer will remain open and irrevocable for 14 calendar days after service by U.S. Mail and email. If Plaintiff does not accept this offer in writing within 14 days after service, then this offer shall be deemed withdrawn in accordance with Fed. R. Civ. P. 68(b).

Date: December 6, 2024

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Attorneys for Defendant

City of Minneapolis

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Pro-Life Action Ministries,
Lucy Maloney, Thomas Wilkin,
and Debra Braun,

Court File No. 23-CV-853 (ECT/DJF)

Plaintiffs,

**RULE 68 OFFER OF JUDGMENT TO
PLAINTIFF DEBRA BRAUN**

v.

City of Minneapolis,
A Minnesota municipality,

Defendant.

TO: Plaintiff Debra Braun and her attorneys of record:

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant City of Minneapolis hereby offers to allow Plaintiff Debra Braun to take judgment against Defendant on all claims made or which could have been made in Plaintiff's Amended Complaint in the amount of \$10.00 (ten dollars), plus reasonable attorneys' fees and costs incurred by Plaintiff prior to the date of this offer; that is, with the costs then accrued. The attorneys' fees and costs will be in an amount to be set by the Court. This amount is intended to cover and exceed all damages sought in the Amended Complaint, including "nominal" damages.

Said relief is inclusive of all of Plaintiff's claims and relief sought against Defendant as set forth in Plaintiff's Amended Complaint. Acceptance of the Rule

68 Offer will terminate all proceedings before the Court and allow Plaintiff's counsel to petition the Court for reasonable costs and attorney's fees incurred to date. If Plaintiff accepts this offer, Plaintiff shall have the right to petition the Court for Plaintiff's claimed reasonable attorneys' fees and costs as a prevailing party in this action pursuant to 42 U.S.C. § 1988(b) and any other legally applicable authority. Defendant reserves the right to challenge Plaintiff's petition for attorneys' fees and costs pursuant to Federal Rule of Civil Procedure 54(d)(2)(C) and any other legally applicable authority.

Acceptance of this offer of judgment will act to release and discharge Defendant, its successors or assigns; and all past and present officials, employees, representatives and agents of the City of Minneapolis, or any agency therefrom, from any and all claims that were or could have been alleged by Plaintiff in the above-captioned action.

Pursuant to the terms of Rule 68, this offer will remain open and irrevocable for 14 calendar days after service by U.S. Mail and email. If Plaintiff does not accept this offer in writing within 14 days after service, then this offer shall be deemed withdrawn in accordance with Fed. R. Civ. P. 68(b).

Date: December 6, 2024

KRISTYN ANDERSON

City Attorney

By s/ Sara J. Lathrop

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Attorneys for Defendant

City of Minneapolis

UNITED STATES DISTRICT COURT
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Pro-Life Action Ministries,
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Court File No. 23-CV-853 (ECT/DJF)

Plaintiffs,

v.

**RULE 68 OFFER OF JUDGMENT TO
PLAINTIFF THOMAS WILKIN**

City of Minneapolis,
A Minnesota municipality,

Defendant.

TO: Plaintiff Thomas Wilkin and his attorneys of record:

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant City of Minneapolis hereby offers to allow Plaintiff Thomas Wilkin to take judgment against Defendant on all claims made or which could have been made in Plaintiff's Amended Complaint in the amount of \$10.00 (ten dollars), plus reasonable attorneys' fees and costs incurred by Plaintiff prior to the date of this offer; that is, with the costs then accrued. The attorneys' fees and costs will be in an amount to be set by the Court. This amount is intended to cover and exceed all damages sought in the Amended Complaint, including "nominal" damages.

Said relief is inclusive of all of Plaintiff's claims and relief sought against Defendant as set forth in Plaintiff's Amended Complaint. Acceptance of the Rule

68 Offer will terminate all proceedings before the Court and allow Plaintiff's counsel to petition the Court for reasonable costs and attorney's fees incurred to date. If Plaintiff accepts this offer, Plaintiff shall have the right to petition the Court for Plaintiff's claimed reasonable attorneys' fees and costs as a prevailing party in this action pursuant to 42 U.S.C. § 1988(b) and any other legally applicable authority. Defendant reserves the right to challenge Plaintiff's petition for attorneys' fees and costs pursuant to Federal Rule of Civil Procedure 54(d)(2)(C) and any other legally applicable authority.

Acceptance of this offer of judgment will act to release and discharge Defendant, its successors or assigns; and all past and present officials, employees, representatives and agents of the City of Minneapolis, or any agency therefrom, from any and all claims that were or could have been alleged by Plaintiff in the above-captioned action.

Pursuant to the terms of Rule 68, this offer will remain open and irrevocable for 14 calendar days after service by U.S. Mail and email. If Plaintiff does not accept this offer in writing within 14 days after service, then this offer shall be deemed withdrawn in accordance with Fed. R. Civ. P. 68(b).

Date: December 6, 2024

KRISTYN ANDERSON

City Attorney

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Attorneys for Defendant

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